

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL No. 14-158
)	
ZUNED SUNESRA)	

**DEFENDANT ZUNED SUNESRA'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO MOVE FOR REVOCATION OF DETENTION ORDER**

Defendant Zuned Sunesra by and through his undersigned counsel submits this Unopposed Motion for Enlargement of Time to Move for Revocation of Detention Order, as follows:

1. On November 20, 2014, the parties appeared before Chief United States Magistrate Judge Maureen P. Kelly for a hearing on Defendant's Motion for Pretrial Release on Conditions.
2. On November 24, 2014, at the continuance of the detention hearing, Chief Magistrate Judge Kelly issued an Order of Detention Pending Trial.
3. The Bail Reform Act affords the right to move for revocation of a detention order. 18 U.S.C. § 3145(b).
4. Parties generally have fourteen days to appeal a United States Magistrate Judge's ruling pursuant to Federal Rule of Criminal Procedure 59(a).
5. Counsel for Defendant Zuned Sunesra has conferred with the assigned Assistant U.S. Attorney regarding a 30 day extension of time within which to file a motion for revocation of the Order of Detention Pending Trial, until on or before January 7, 2015.
6. Assistant United States Attorney Eric Rosen does not oppose a 30 day extension and has authorized the undersigned to represent the government's position to the Court.

WHEREFORE, Defendant Zuned Sunesra respectfully requests a thirty day extension of time within which to file a motion for revocation of Chief United States Magistrate Judge Kelly's November 24, 2014 Order of Detention.

Respectfully submitted,

/s/ Charles Kelly

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Unopposed Motion for Enlargement of Time to Move for Revocation of Detention Order has been served on this 4th day of December, 2014, upon the following parties via the Court's CM/ECF System, and is otherwise available for viewing and downloading on the CM/ECF System:

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